



MASONICARE

A handwritten signature, possibly 'C. Johnson', with the date '12/16' written below it.

*Sharing a Tradition of Caring for More Than 100 Years***December 16, 1997**

22 Masonic Avenue

P.O. Box 70

Wallingford, CT 06492

203 284 3929

Masonic Geriatric
Healthcare Center

Ashlar Village

Ashlar of Newtown

The Masonic
Charity Foundation
of Connecticut

**Ms. Cynthia L. Johnson, Director
Cash Management Policy and Planning Division
Financial Management Service
U.S. Department of the Treasury, Room 420
401 14th Street S.W.
Washington, DC 20227**

Dear Ms. Johnson:

We received a request for comments regarding the proposed Treasury regulations for direct deposit of social security and other federal payments. Masonicare currently acts in a fiduciary capacity for over 450 of the residents at its affiliates. We have a very large inflow of federal payments for our residents each month. All of the federal payments that we receive for our residents are made by check. While there is no doubt that we will have to make major revisions in our processing over the long run regarding the EFT payment issue, we have three major concerns in this area. They are:

- 1. In our situation, we simply cannot establish a separate bank account for each resident for the purpose of collecting social security and other federal payments. Do the proposed regulations permit the deposit of all payments for residents of a skilled nursing facility into a single bank account? The regulations should also not prohibit this. This is the most efficient way to serve a large population base where they have asked us to serve in a fiduciary capacity for them.**
- 2. If the regulations prohibit the deposit of payments into a single account when the facility acts in a fiduciary capacity for a resident, then the waiver process should permit a check to be received by the recipient in the skilled nursing facility. This is the simplest and most cost effective approach in managing a resident's monthly income from a fiduciary perspective.**
- 3. There is a cost issue to be aware of. Many of our residents are on Title 19 with the State of Connecticut. It would be very costly administratively to set up and maintain separate bank accounts just to receive monthly federal payments.**



SERVING SENIORS IN THE NAME OF MASONRY

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Ms. Johnson

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We currently receive a large volume of federal checks each month. We want to keep this process as efficient as possible. Our key concern is the possible requirement of having to set up a separate bank account for each resident where we serve in a fiduciary capacity. Having the ability to place all federal payments electronically into a single account would be preferable and more workable. If this is not allowed, then there should be a section in the waiver process that permits a resident of a skilled nursing facility to continue to receive a check if the skilled nursing facility is serving in a fiduciary capacity. If you have any questions, please do not hesitate to call me at (203) 284-3934.

Sincerely,



Louis J. Brochu
Louis J. Brochu
Fiduciary Manager

ljb

cc: R. Barrio, CFO